

January 20, 2021  
VIA ELECTRONIC FILING

The Honorable Jocelyn G. Boyd  
Chief Clerk/Executive Director  
Public Service Commission of South Carolina  
101 Executive Center Drive, Suite 100  
Columbia, SC 29210

**Re: *Application of Duke Energy Carolinas, LLC and Duke Energy Progress, LLC for Approval of Modifications to South Carolina Generator Interconnection Procedures to Implement Queue Reform and Appendix Duke CS*, PSC Docket No. 2019-326-E**

Dear Ms. Boyd:

I write on behalf of the South Carolina Solar Business Alliance ("SCSBA") regarding the *Application for Approval of Modifications to South Carolina Generator Interconnection Procedures to Implement Queue Reform and Appendix Duke CS* ("Application"), filed by Duke Energy Carolinas, LLC and Duke Energy Progress, LLC (collectively, "Duke") in this docket on November 17, 2020. SCSBA supports the limited revisions to the South Carolina Generator Interconnection Procedures ("SCGIP") proposed in the Application, and urges this Commission to approve these revisions and Duke's proposed Appendix Duke CS. In SCSBA's view, enabling the implementation of Cluster Studies under the SCGIP and allowing Duke to transition to a cluster-based process for the study of Interconnection Requests are important steps toward resolving long-standing issues with queue management, and will facilitate the efficient development of utility-scale solar projects in South Carolina.

As discussed in the Application, Duke's Queue Reform proposal is the result of nearly two years of extensive stakeholder engagement with Duke, the SCSBA, and other stakeholders to develop changes to Duke's interconnection study processes. The proposed changes will, we hope, expedite the study of new generation projects, allow the sharing of costs for improvements to Duke's system among Interconnection Customers that will most directly benefit from those upgrades, and ultimately streamline the development of new renewable generation in Duke's South Carolina service territory.

SCSBA appreciates the extensive time and resources Duke has devoted to engaging stakeholders and soliciting their input in the development of a consensus proposal for Queue Reform. We hope that this process will serve as a model for collaboration with Duke and other South Carolina utilities, not only in the next phase of revisions to the SCGIP in this docket, but in other contexts as well.

SCSBA urges the Commission to approve the requested changes to the SCGIP as well as the proposed Appendix CS as soon as possible.

Sincerely,



Bret Sowers  
Board Chairman, SCSBA